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7 ROCKET VENTURES II, L.P.; ROCKET VENTURES II CEO
FUND, L.P.; and ROCKET VENTURES SBIC PARTNERS,
LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES SMALL BUSINESS
ADMINISTRATION in its capacity as Receiver
for ROCKET VENTURES II SBIC, L.P.,

Plaintiff,

V.

16 ROCKET VENTURES II, L.P., a California
17 limited partnership; ROCKET VENTURES II
18 CEO FUND, L.P., a California limited
19 partnership; and ROCKET VENTURES SBIC
20 PARTNERS, LLC, a Delaware limited liability
21 company; Cordusio Societa Fiduciaria Per
22 Azioni Lozia Federico; Kenneth W. & Melissa
23 Baldwin; Paul Cantwell; Peter Ayrton Cheese;
24 Yves Derville; Richard S. Cuccioli; Alistair
25 Anderson Donald; Philippe Gire; Jean-Claude
26 Guez; Joseph Hawes & Christopher Eyden; Alan
John Healey; Craig Foster Heimark; David E.
Kropp; Gregory Charles Meekings; Michele
Liberato; Fred Cucchi; ValorLife; Alberto
Gandini; Rijete Pty. Ltd.; Christopher Stainton;
Tyna Development; Thomas Tynan; Patrice
Vinet; Hahei Limited; Michael Saunier; Michel
Roujansky; Nigel Backwith; Justine Lumb;
Andrew Middleton; Ajmair Singh Bhullar;
Estate of Grant A. Dove; Luca Casiraghi; David
Mather

Defendants.

Case No. CV-10-4425 JSW

**STIPULATION AND [PROPOSED]
ORDER BETWEEN PLAINTIFF
RECEIVER AND DEFENDANTS ROCKET
VENTURES II, L.P., ROCKET
VENTURES II CEO FUND, L.P., AND
ROCKET VENTURES SBIC PARTNERS,
LLC TO EXTEND BRIEFING SCHEDULE
ON MOTION FOR SUMMARY
JUDGMENT**

1 Defendants Rocket Ventures II, L.P., Rocket Ventures II CEO Fund, L.P., and Rocket
2 Ventures SBIC Partners, LLC (“Defendants”) and Plaintiff United States Business Administration
3 in its capacity as Receiver for Rocket Ventures II SBIC, L.P. (“Plaintiff Receiver”), by and
4 through their respective counsel of record, hereby stipulate and agree as follows:

5 **WHEREAS**, Plaintiff Receiver filed a motion for summary judgment on April 3, 2012;

6 **WHEREAS**, Defendants’ opposition to the motion for summary judgment is presently due
7 on April 17, 2012;

8 **WHEREAS**, Plaintiff Receiver’s reply in support of its motion for summary judgment is
9 presently due on April 24, 2012;

10 **WHEREAS**, the hearing on the motion for summary judgment is presently scheduled for
11 June 15, 2012;

12 **WHEREAS**, Defendants currently lack facts that Defendants believe may be essential to
13 support their opposition to Plaintiff Receiver’s motion for summary judgment;

14 **WHEREAS**, Defendants had scheduled three depositions, but agreed with Plaintiff
15 Receiver to delay those depositions after Plaintiff Receiver’s Amended Complaint added 33 new
16 defendants in January, and Defendants have not rescheduled these depositions as several of the
17 new defendants are still being located and/or responding to the complaint;

18 **WHEREAS**, the Parties agree that it is in the interest of both judicial economy and
19 efficiency for all parties to permit additional time for Defendants to respond to Plaintiff
20 Receiver’s motion so that they may proceed with their depositions in advance of their response;

21 **FOR THE REASONS** set forth above:

22 **IT IS HEREBY STIPULATED AND ORDERED THAT:**

23 1. Defendants’ opposition to Plaintiff Receiver’s motion for summary judgment is
24 extended to and including May 18, 2012;

25 2. Plaintiff Receiver’s reply in support of its motion for summary judgment is
26 extended to and including ~~June 1~~^{May 29}, 2012; and

27 3. The hearing on the motion for summary judgment will remain the same.

28

SO STIPULATED.

Dated: April 17, 2012

COOLEY LLP

By: /s/ Gordon C. Atkinson

Gordon C. Atkinson

Attorneys for Defendants

**ROCKET VENTURES II, L.P., ROCKET
VENTURES II CEO FUND, L.P. and ROCKET
VENTURES SBIC PARTNERS, LLC**

Dated: April 17, 2011

SCHNADER HARRISON SEGAL & LEWIS
LLP

By: /s/ T. Scott Tate
T. Scott Tate

Attorneys for Plaintiff
UNITED STATES SMALL BUSINESS
ADMINISTRATION in its capacity as Receiver
for ROCKET VENTURES II SBIC, L.P.

Filer's Attestation re signatures: Gordon C. Atkinson hereby attests that concurrence in the filing of this document has been obtained.

ORDER

IT IS SO ORDERED; AS MODIFIED ABOVE.

Dated: April 17, 2012

Honorable Jeffrey S. White
United States District Court Judge